

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC # _____
DATE FILED: 3/8/2022

Konta, Georges, and Buza, P.C.
233 Broadway, Suite 900
New York, New York 10279
212-710-5166 (tel.)
212-710-5162 (fax)
johnpbuza@aol.com

MEMO ENDORSED

March 7, 2022

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The pretrial conference is adjourned to April 14, 2022 at 11:30 a.m. Speedy trial time is excluded from March 9, 2022 until April 14, 2022, in the interest of justice.
SO ORDERED.


Edgardo Ramos, U.S.D.J.

Dated: 3/8/2022

Re: *United States v. Jermal Lincoln*, 21 CR 442 (ER) New York, New York

Dear Judge Ramos:

I represent Mr. Lincoln in the above-captioned proceeding. The case is scheduled to be heard on March 9, 2022 at 4:30 P.M. for a status update. I write this letter to request that the matter be adjourned for thirty days. I make this request for two reasons. First, I am engaged in the trial of *United States v. Saint Clair*, 19 Cr. 790 (PKC). The trial is scheduled to occur from 10 a.m. until 5:00 p.m. on March 9, 2022 and is expected to conclude in two weeks. Second, the government has recently extended a plea agreement to resolve this case and my expectation is that it will be resolved by the next court date. A final adjournment of thirty days should give me enough time to conclude my trial and to speak to Mr. Lincoln about the exact parameters of the resolution.

This is my first request to adjourn this specific conference and my third request overall. My previous requests to adjourn the status conference were made because I needed more time to review the voluminous discovery in the matter and because the restrictions imposed by the facility where Mr. Lincoln is housed made it so I could not communicate with him in person. The government did not object to those requests and does not object here.

Should the Court grant the continuance, I would not object to a finding that the ends of justice would be served and that the taking of the action would outweigh the interests of the public and Mr. Lincoln in a speedy trial.

Respectfully Submitted,

/s/

John P. Buza

cc.: AUSA Ashley Nicolas (via ECF)